

- Claim No. 4: Lolonyon Akouete (\$3,146,823.50) – compensation for managerial services, legal strategy, and asset recovery actions.
- Claim No. 5: Denise Edwards (\$333,491.75) – compensation for managerial services and asset recovery actions.
- Claim No. 7: Nathanson & Goldberg, P.C. (\$121,692.83) – legal services provided for litigation to recover the Debtor’s interest in the MUFG Union Bank funds and the real estate asset.

III. SETTLEMENT CLAIMS HISTORY AND STRUCTURE

Claims No. 2 (Ferris Development Group) and No. 7 (Nathanson & Goldberg, P.C.) were previously included in a withdrawn settlement proposal filed by the Trustee. Under that proposal:

- Ferris Development Group would receive a \$10,000 allowed claim and a \$100,000 reimbursement for RFP-related bid preparation costs, contingent on a sale to a third party.
- Nathanson & Goldberg, P.C., would retain its \$121,692.83 claim, with its processing to proceed in the ordinary course.

Additionally, Claim No. 6 (MobileStreet Trust) was acknowledged and set at \$374,934.60 pursuant to a stipulation in the same withdrawn settlement.

IV. POTENTIAL PREJUDICE TO DERIVATIVE CLAIMANTS

The Trustee’s pending objection to Movant’s claim, if successful, could substantially undermine or invalidate these related claims. This risk exists despite their prior inclusion in settlement discussions, as future settlements may exclude or challenge them on technical or derivative grounds.

V. PRIOR SETTLEMENT EFFORTS

On July 2024, the Trustee proposed a global settlement involving the Town of Westborough, Ferris Development Group, Nathanson & Goldberg, MobileStreet Trust, and Lax Media. The proposal aimed to resolve all disputes involving the Property and recover value for the estate through a structured sale. The agreement was later withdrawn, but its structure acknowledged the direct relevance of claims that arose from Movant’s asset preservation actions.

VI. NEED FOR CONCURRENT CLAIM EVALUATION

To ensure judicial economy, procedural fairness, and protection against undue prejudice, all claims arising from the same underlying factual and legal bases must be considered concurrently. Evaluating these claims together will prevent piecemeal adjudication, duplicative litigation, and ensure fair notice and protection for all creditors relying on Movant's foundational efforts.

VII. RELIEF REQUESTED

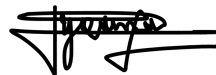
WHEREFORE, Movant respectfully requests the Court:

1. Order the Trustee to evaluate and formally determine the allowability of all creditor claims (Claims No. 1, 2, 3, 5, and 7) concurrently with the Trustee’s objection to Claim No. 4;
2. Prohibit the Trustee from future piecemeal objections to these claims based solely on the outcome of Claim No. 4 without separate motion and hearing;

3. Grant such additional relief as the Court deems just and equitable.

DATED: May 27, 2025, Respectfully submitted:

By creditor,



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CERTIFICATE OF SERVICE

I, Lolonyon Akouete, hereby certify that the above document is served by email and mailing a copy of the same, first-class mail, to the following:

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